

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GOVERNMENT EMPLOYEES INSURANCE  
CO., et al.,

Plaintiffs,

–against–

BHARGAV PATEL, M.D., et al.,

Defendants.

Case No.: 1:23-cv-02835-KAM-PK

**NOTICE OF PLAINTIFFS' MOTION  
TO STAY AND ENJOIN DEFENDANTS' COLLECTION PROCEEDINGS**

**PLEASE TAKE NOTICE** that the Plaintiffs, Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co., (collectively, “GEICO”) respectfully move this Court for an Order, pursuant to Federal Rule of Civil Procedure 65 and the Court’s inherent power, granting Plaintiffs’ Motion to Stay and Enjoin Defendants’ Collection Proceedings, pending disposition of GEICO’s declaratory judgment claim in this action, together with such other and further relief as the Court deems just.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to this motion shall be served in accordance with Local Civil Rule 6.1(b).

Dated: Uniondale, New York  
November 24, 2023

Respectfully submitted,

RIVKIN RADLER LLP

By: /s/ John P. Mulvaney

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Employees Insurance Company, GEICO  
Indemnity Company, GEICO General  
Insurance Company, and GEICO Casualty  
Company*

### **CERTIFICATE OF SERVICE**

I hereby certify that this Notice of Motion, Plaintiffs' Memorandum of Law, the accompanying Declarations of John P. Mulvaney, Esq. and Kathleen Asmus, and all Exhibits have been served on Defendants via e-mail and regular mail.

Dated: November 24, 2023

/s/ John P. Mulvaney

John P. Mulvaney